

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012**

DOCKET No. N2012-1

**UNITED STATES POSTAL SERVICE NOTICE OF FILING ERRATA TO
DIRECT TESTIMONY OF WITNESS NERI (USPS-T-4)
(March 22, 2012)**

The version of the Direct Testimony of Frank Neri on Behalf of the United States Postal Service (USPS-T-4) filed on December 5, 2011 contains errors on pages 18 and 26.¹ Replacement pages attached to this notice include corrected pages 18 and 26, with additional content shown in gray highlighted text.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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¹ Direct Testimony of Frank Neri on Behalf of the United States Postal Service, PRC Docket No. N2012-1 (December 5, 2011).

1 finalized on the first touch. This environment would also impact flat-sized mail sortation as
 2 depicted in the table below.

OUTGOING SECONDARY WORKLOAD		
Processing Category	FY '10 Average Daily Workload	Proposed Average Daily Workload
Letters	13,183,976	0
Flats	1,170,524	494,363

3
 4 Mail processing employee schedules have historically been created to staff based
 5 on arrival profiles and operating windows driven by service standards. With the decline in
 6 First-Class Mail, the workload being processed in these windows is insufficient to achieve
 7 full equipment or labor utilization. The rigid operating window thus prevents full utilization
 8 of equipment and labor resources.

9 The proposed revision of service standards would eliminate the need for mail
 10 processing facilities to wait for overnight First-Class Mail, resulting in a reduction of mail
 11 processing idle time. For further details on mail processing idle time calculations, please
 12 refer to USPS Library Reference USPS-LR-N2012-1/10. Full time employees will staff core
 13 production hours supplemented by a flexible workforce adjusted to daily staffing needs. By
 14 utilizing the flexible work force that the national labor agreements allow, management will
 15 be able to expand or contract production hours in concert with daily mail volumes.

16 Additionally, the Postal Service could plan earlier times for primary and secondary
 17 processing. Under the proposal, earlier critical acceptance times ("CATs") would be
 18 established for mailings entered at BMEUs to align with revised critical entry times ("CETs")
 19 at mail processing facilities. Earlier acceptance and entry times would allow committed

a reduction of 32.87% in night differential hours. ~~For further details on night differential calculations, refer to library reference USPS-LR-N2012-1/10.~~ A description of night differential by operation appears below in Figure 10.

Figure 10: Night Differential by Operation

Description	Current % ND	Future % ND
F1 Supervisors	65.6%	39.8%
Auto Letter Incoming Primary	61.6%	0.0%
Auto Letter CRT/DPS	91.1%	57.1%
Auto Letter International	71.3%	71.3%
Auto Letter Outgoing	72.0%	72.0%
Auto Flat AFSM Incoming Primary	61.9%	0.0%
Auto Flat AFSM CRT	73.9%	57.1%
Auto Flat AFSM Outgoing	71.4%	71.4%
Auto Flat DPS	60.8%	60.8%
Auto Flat non-AFSM Incoming Primary	62.7%	0.0%
Auto Flat non-AFSM CRT	81.5%	57.1%
Auto Flat International	38.2%	38.2%
Auto Flat Other	72.9%	72.9%
Auto Flat non-AFSM Outgoing	78.5%	78.5%
Mech Package Incoming Primary	54.8%	0.0%
Mech Package International	38.1%	38.1%
Mech Package Other	51.2%	51.2%
Mech Package Outgoing	72.8%	72.8%
Manual Incoming Primary	86.3%	0.0%
Manual CRT	71.4%	71.4%
Manual International	42.2%	42.2%
Manual Outgoing	85.1%	85.1%
LCREM Operations	67.0%	67.0%
LMLM Operations	70.3%	70.3%
REC Operations	99.3%	99.3%
LDC 17 Flat Mail Prep - AFSM	68.9%	38.5%
LDC 17 Cancellation Operations	71.4%	71.4%
LDC 17 Dock Related Operations	59.9%	59.9%
LDC 17 Inbound Dock Operations	57.0%	0.0%
LDC 17 Incoming Prep & Movement	61.3%	0.0%
LDC 17 Other	63.2%	63.2%
LDC 17 Outbound Dock Operations	61.2%	61.2%
LDC 17 Outgoing Prep	70.4%	70.4%
LDC 17 Presort Operations	71.8%	0.0%
LDC 18 Operations To Ignore	56.2%	N/A
LDC 18 All Other Operations	54.3%	54.3%
Non-Function1 Operations & F1 Training	34.8%	34.8%
Grand Total	58.6%	39.4%